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Attorneys for Debtors, Post-Effective Date Debtors,
and the Motors Liquidation Company GUC Trust

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i>,	:
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	:
	:
-----X	

	Chapter 11 Case No.
	09-50026 (REG)
	(Jointly Administered)

MOTION PURSUANT TO LOCAL R. BANKR. P. 2090-1(b)
AUTHORIZING MARGARET HOPE ALLEN TO PRACTICE *PRO HAC VICE*

TO THE HONORABLE ROBERT E. GERBER,
UNITED STATES BANKRUPTCY JUDGE:

Relief Requested

1. Joseph H. Smolinsky (“**Movant**”), a member in good standing of the Bar of the State of New York, an attorney admitted to practice before the United States Bankruptcy Court for the Southern District of New York, and a member of Weil, Gotshal & Manges LLP (“**Weil**”), hereby moves the Court to enter an order permitting Margaret Hope Allen, also an attorney at Weil, to practice *pro hac vice* before the United States Bankruptcy Court for the Southern District of New York to represent the debtors in the above captioned chapter 11 case (collectively, the “**Debtors**”) and the Motors

Liquidation Company GUC Trust (the “**GUC Trust**,” and together with the Debtors, the “**MLC Parties**”), pursuant to Rule 2090-1(b) of the Local Rules of the Bankruptcy Court for the Southern District of New York (“**Local Rules**”).

Jurisdiction

2. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

The Relief Requested Should Be Approved by the Court

3. In support of the Motion, Movant states as follows:

(i) Ms. Allen is a member in good standing of the State of Texas. There are no disciplinary proceedings pending in any court against her.

(ii) In support of the relief requested in this Motion, attached as Exhibit A is a certificate pursuant to Local Rule 2090-1(b).

(iii) Movant requests that this Court approve this Motion so that Ms. Allen may file pleadings and appear and be heard at hearings in these chapter 11 cases.

(iv) No previous request for the relief sought herein has been made to this or any other Court.

Notice

4. Notice of this Motion has been provided to parties in interest in accordance with the Sixth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures, dated May 5, 2011 [ECF No. 10183]. The Movant submits that such notice is sufficient and no other or further notice need be provided.

WHEREFORE the Movant respectfully requests entry of an order granting
the relief requested herein and such other and further relief as is just.

Dated: New York, New York
June 17, 2011

/s/ Joseph H. Smolinsky

Harvey R. Miller

Stephen Karotkin

Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Attorneys for Debtors, Post-Effective Date
Debtors, and the Motors Liquidation
Company GUC Trust

Exhibit A

I certify that I am eligible for admission to this Court, am admitted to practice in the jurisdiction specified in the Motion, and am in good standing in such jurisdiction; I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the course, or in the preparation, of these chapter 11 cases, pursuant to Local Rule 2090-1(b); and I have access to, or have acquired, a copy of the Local Rules and am generally familiar with such Local Rules.

Mailing Address: Margaret Hope Allen
Weil, Gotshal & Manges LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201

E-mail: Margaret.allen@weil.com

Telephone: (214) 746-8137

I have agreed to pay the fee of \$25 upon approval by this Court admitting me to practice **pro hac vice**.

Dated: June 17, 2011

/s/ Margaret Hope Allen
Margaret Hope Allen
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201
Telephone: (214) 746-8137
Facsimile: (214) 746-7777

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
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Debtors.	:
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Chapter 11 Case No.
09-50026 (REG)
(Jointly Administered)

ORDER PURSUANT TO LOCAL R. BANKR. P. 2090-1(b)
AUTHORIZING MARGARET HOPE ALLEN TO PRACTICE PRO HAC VICE

Upon the Motion, dated June 17, 2011 (the “**Motion**”)¹ pursuant to Rule 2090-1(b) of the Local Rules of the Bankruptcy Court for the Southern District of New York (“**Local Rules**”), for entry of an order authorizing Margaret Hope Allen to practice *pro hac vice* before the United States Bankruptcy Court for the Southern District of New York to represent the MLC Parties in the above-referenced chapter 11 case, all as more fully described in the Motion; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Motion is granted as provided herein; and it is further

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

ORDERED that Margaret Hope Allen is permitted to appear *pro hac vice* as counsel to the MLC Parties in the above-captioned chapter 11 case, subject to the payment of the filing fee; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York
June __, 2011

United States Bankruptcy Judge